

EXHIBIT F

AFFIDAVIT

COMMONWEALTH OF VIRGINIA
AT LARGE:

I, the undersigned, a Notary Public in and for the Commonwealth of Virginia at Large do hereby certify that DREWRY WILLIAM CARTER made statement under oath as follows:

1. My name is DREWRY WILLIAM CARTER, and I reside at 359 Wright Road, Ridgeway, Virginia 24148. I am over eighteen (18) years of age, of sound mind, capable of making this Affidavit, and am personally acquainted with the facts herein stated.

2. My social security number is 226-60-4188, and my date of birth is April 25, 1946.

3. On or about March 25, 2008, a left lung pleura biopsy revealed fibrosis, chronic inflammation, and atypical mesothelial hyperplasia. On or about September 18, 2008, a second left lung pleura biopsy was performed by D. Patrick Burney, M.D., and I was diagnosed as having malignant mesothelioma. This diagnosis was communicated to me by Dr. Burney following the biopsy procedure. Since receiving this diagnosis, I have been treated and followed by Dr. Kenneth Karb, who is my treating oncologist. I am currently taking medications prescribed by my doctors, but these medications do not affect my memory or ability to give this true and accurate statement.

4. I was shocked when I received the diagnosis of mesothelioma.

5. My wife and I were married on December 23, 1963, in Rockingham County, North Carolina. We will celebrate our 45th wedding anniversary this year. I have remained married to and have resided with my wife from the time that we were married until today. I have one son, William ^{Tracey DWC} ~~Tracy~~ Carter, who was born on April 22, 1966. My son, William, currently lives in Wirtz, Virginia, and regularly visits with me.

6. From 1962 to 1963, I was employed by Pannel Knitting Mill in Martinsville, Virginia, as a production worker. From 1963 to 1967, I was employed by

Initials *DWC*

the United States Navy as an aviation jet mechanic. I was stationed in Quonset Point, Rhode Island and was assigned to The Essex, Lake Champlain and USS Wasp. From May 1967 to August 1967, I was employed by the Newport News Shipyard as a pipe fitter. For approximately one month in 1967, I was employed by Spray Cotton Mills in Eden, North Carolina, as a production worker. From 1967 to 1972, I was employed by Fieldcrest Karstan Mill in Eden, North Carolina, as a mechanic and supervisor. From 1972 to 1974, I was employed by Chan Stan Mobil Station in Eden, North Carolina, as a manager. In 1964, for approximately six months, I was employed by B&W Construction at the DuPont plant in Martinsville, Virginia, as a millwright. From 1974 to 1975, I was employed by Carolina Crane at the Coca-Cola USA plant in Greensboro, North Carolina, as a millwright. From 1975 to 1978, I was employed by Goodyear Tire & Rubber Co. in Danville, Virginia, as a mechanic. From 1978 to 2002, I was employed by Miller Brewery at the Miller plant in Eden, North Carolina, as an industrial mechanic.

7. Throughout my employment as stated above, I was in regular contact with asbestos containing materials as my job tasks required.

8. Additionally, these tasks were regularly performed in the direct vicinity of insulating trades, including other pipe fitters, insulators, millwrights, welders and mechanics. I was continually exposed to the dust created by the other insulating trades' work.

9. During my years of employment as stated above, I specifically recall the use of the asbestos-containing products listed on Exhibit A.

10. Additionally, I specifically recall the following co-workers at the DuPont plant in Martinsville, Virginia, and believe that they have also been exposed to asbestos-containing products: William H. Black, William H. Bousman, Jr., Edward E. Compton, George R. Heffinger, David T. Tatum, Maynard Thompson, Ernest N. Williams, Noel L. Wood and James A. Cox.

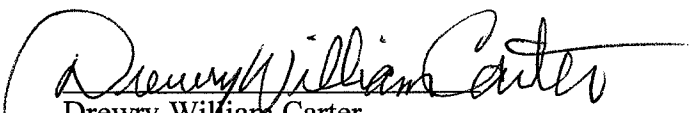
11. I specifically recall the following co-worker at Miller Brewing in Eden, North Carolina, and believe that he has also been exposed to asbestos-containing products: Frank Webb.

Initials 

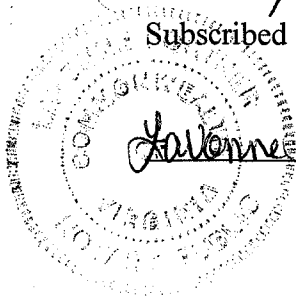
12. At no time during my employment, as stated above, was I given any protective respiratory equipment specifically to minimize or prevent exposure to the dust created from the use of asbestos-containing materials.

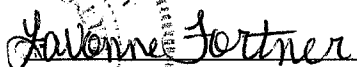
13. At no time during my employment, as stated above, was I warned that breathing asbestos dust from the products I used and/or from the products being installed around me could be hazardous to me.

AND FURTHER THE AFFIANT SAYETH NOT.


Drewry William Carter

Subscribed and sworn before me this 28th day of October, 2008.





Commission ID No.: 355871

Notary Public My Commission Expires: 01/31/2009

EXHIBIT A
DREWRY WILLIAM CARTER

The following list includes, but is not limited to, asbestos-containing products identified by DREWRY WILLIAM CARTER, during his employment as stated above. Mr. Carter reserves the right to supplement this list should he recall further details regarding his exposure to asbestos.

AMCHEM (BENJAMIN FOSTER)

Flame resistant high velocity duct sealant
Heat resistant sealant
FOAMSEAL sealant

ANCHOR PACKING COMPANY

Anchor packings and/or gaskets
Anchor rope, wick, tape
Brakelinings
Ankorite packing, gaskets, sheets
Ankotallie gaskets

A.C. AND S., INC. (ARMSTRONG CONTRACTING & SUPPLY

Armstrong thermasil pipecovering and block
Armstrong kaytherm pipecovering and block
High temperature pipecovering and block

ASBESTOSPRAY CORPORATION

Cements
Adhesive

A.W. CHESTERON

Packing
Gaskets
Chesterton Style 315 Carson

BABCOCK & WILCOX BOILERS

Boilers
Rope packings
Furnaces with Asbestos Lining Kaowool blankets

CELOTEX (PHILIP CAREY)

Celotex asbestos roof coating

DANA CORPORATION

Victor sheet gaskets
Asbestos/Steam gaskets

Initials 

FLEXITALLIC

Spiral wound industrial gaskets

FLINTKOTE

Asbestos vinyl floor tile

Dry joint compound

Plastic cement

FORTY-EIGHT INSULATIONS

Quik-Set cement

High temperature bonding cement

FOSTER WHEELER

Pipecovering and block

GAF CORPORATION (RUBEROID)

Asbestos paper

T/NA-100 insulation jacketing

GARLOCK

Garlock gaskets

Garlock sheet gasket material

Garlock rope

Garlock packing

Garlock asbestos & rubber packing

Woven asbestos gasketing cloth style 604

GENERAL ELECTRIC

Turbines

O.N.C. (asbestos insulated cable)

GEORGIA PACIFIC CORPORATION

Ready mix joint compound

H.K. PORTER (SOUTHERN ASBESTOS COMPANY)

Asbestos cloth, tape

INGERSOLL-RAND

Air compressors

Gaskets

JOHNS-MANSVILLE SALES CORPORATION

Johns-Mansville pipecovering

Johns-Mansville gaskets

Johns-Mansville cement

Initials *QAC*

KEASBY & MATTISON

Pipecovering

KEENE CORPORATION (B & H AND BEH)

Powerhouse cement

MINNESOTA MANUFACTURING & MINING CO. (3M)

3M sandpaper

3M cement

3M packing

3M masks

MOBIL OIL

Dumdum

NATIONAL GYPSUM COMPANY

Gold Bond products

OWENS-CORNING FIBERGLAS CORPORATION

Kaylo pipecovering

OWENS-ILLINOIS

Kaylo pipecovering

RAYBESTOS-MANHATTAN

Asbestos felt

Rope

Brakeshoe lining (Red Demon)

Tape

Cloth

RILEY STOKER

Boilers

RUST ENGINEERING: (PEABODY)

Asbestos cloth

Asbestos gaskets

Asbestos packing-seals-rope

SEPCO CORPORATION

Gaskets

Packing

UNARCO

Unibestos pipecovering and/or block

Initials 

UNIROYAL

Cloth

Gaskets and packings

WESTINGHOUSE

Westinghouse motors

Westinghouse switch gears

Westinghouse breakers

Westinghouse bus ways

Westinghouse relays

Westinghouse packing

W.R. GRACE

Super-40 perlite

WORTHINGTON

Pumps

SUPPLIERS/DISTRIBUTORS OF ASBESTOS PRODUCTS

WACO, Inc.

In addition to the specific products listed above, claimant also recalls using the following types of asbestos products:

Asbestos Floor Tile, Roofing Tile, Gaskets, Tape, Curtains, Pipeline Felts, Paper, Rope, Fabric or Cloth, Pipecovering, Pipecovering and Block, Boiler Jackets, Fireproofing, Handhold Gaskets.

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